

WILLIAM LEE GRANT II

PLAINTIFF

901 WYTHE ROAD SPRINGFIELD, ILLINOIS 62702

versus

DONALD HENRY RUMSFELD

DEFENDANT

333 WEST WACKER DRIVE

SUITE 830

CHICAGO, ILLINOIS 60606

* DONALD HENRY RUMSFELD IS A RESIDENT OF MADISON COUNTY, MONTANA.

ACTIONS OF REAGAN'S CHIEF OF STAFF (AORCOS) COMPLAINT

1) THE DISTRICT OF MONTANA HAS SUBJECT -

18 USC 1595 - Peonage, Slavery, and Human Trafficking;

28 USC 1343 - Civil Rights and Elective Franchise;

42 USC 1985(2) - Obstructing Justice;

42 USC 1985(3) - Depriving Persons of Rights or Privileges;

28 USC 1331 - Federal Question; and

28 USC 1652 - State Laws as Rules of Decisions

28 USC 1391(b)(I)-VENUE

UNITED STATES DISTRICT COURT DISTRICT OF MONTANA BUTTE DIVISION

WILLIAM LEE GRANT II
PLAINTIFF

DONALD HENRY RUMSFELD

DEFENDANT.

333 WEST WACKER DRIVE, SUITE 830
CHICAGO, ILLINOIS 60606

COMPLAINT

ACTIONS OF REAGAN'S CHIEF OF STAFF (AORCOS) COMPLAINT

1

MR. GRANT HAS A CLAIM AGAINST JAMES A. BAKER III, WILLIAM PELHAM BARR, SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE, AND DONALD J. TRUMP PURSUANT TO:

Civil Conspiracy
See Adcock v. Brakegate, Ltd.,645 N.E.
2d. 888 (1994).

Abuse of process See Holiday Magic, Inc. v. Scott, 282 N.E. 2d 452 (IL App. Ct. 1972).

False imprisonment
See Heck v. Humphrey, 512 U.S. 477, 484

Invasion of Privacy
See Green v. Chicago Tribune Co., 675
N.E. 2d 249 (Ill. Ct. App. 1996)

Negligent Entrustment

See Norskog v. Pfiel, 197 Ill. 2d. 60 (2001).

Intimidation (720 ILCS 5/12-6(a)(1)

Retaliatory discharge See Taylor v. Board of Education of Chicago, 2014 IL App. (1st) 123744

Unlawful restraint See Florida v. Bostick, 501 U.S. 429 (1991).

Predator Protection Act See 740 ILCS 128/20

Fraud See Hazel-Atlas Glass Co. v. Hartford Empire Co., 322 U.S. 238 (1944).

Authorized Assault See Meerbrey v. Marshal Field & Co., 139 Ill. 2d 455 (1990).

See Heskett v. Fisher Laundry & Cleaners Co., 230 S.W. 2d 28 (Ark. 1950).

"Savings Statute" (735 ILCS 5/13-217)

See Adock v. Brakegate, Ltd., 645 N.E. 2d. 888 (1994)

- 2) Equitable Tolling is applicable:
 - a) Mr. Grant was under the threat of military force to not begin his lawsuit until May of 2016;

See Ralda-Sanden v. Sanden, 2013 IL App. (1st) 121117

See Atwater v. Atwater, 18 Ill. App. 3d 202 (1974).

See Slavis v. Slavis, 12 Ill. App. 3d 467 (1973).

- b) the Illinois Central District Clerk of Court was directed by Six Known Members of the U.S. Department of Defense not enter default (Fed. R. Civ. P. 55(a) against the U.S. Department of Justice and State of Illinois in 16-cv-3245, 17-cv-3261, and 19-cv-3001;

 See Hazel-Atlas Glass Co. v. Hartford Empire Co., 322 U.S. 238 (1944).
- c) Illinois Central District Judges: Colin S. Bruce (16-cv-3245 and 17-cv-3261) and Joe Billy McDade (19-cv-3001) dismissed Mr. Grant's lawsuits in the Illinois Central District at the direction of Six Known Members of the U.S. Department of Defense; and See Hazel-Atlas Glass Co. v. Hartford Empire Co., 322 U.S. 238 (1944).
- d) Seventh Judicial Circuit of Illinois Judge Brian T. Otwell dismissed Mr. Grant's lawsuit (17-MR-754) at the direction of Gregory K. Harris. See Hazel-Atlas Glass Co. v. Hartford Empire Co., 322 U.S. 238 (1944).
- 3) Equitable Tolling is applicable under the Continuing Violations Doctrine:
 - a) James A. Baker III, President George H.W. Bush's Secretary of the U.S. Department of State and White House Chief of Staff;
 - b) William Pelham Barr, President George H.W. Bush's Attorney General of the United States;
 - c) Six Known Members of the U.S. Department of Defense;
 - d) Gregory K. Harris, agent of Six Known Members of the U.S. Department of Defense, and Assistant U.S. Attorney for the Illinois Central District;

- e) officials and employees of the State of Illinois have:
- f) engaged in a thirty (30) year conspiracy of tortious activity towards Mr. Grant beginning in 1990;
- g) Ryan Croke, Deputy Chief of Staff and Chief of Staff to Illinois Governor Patrick
 J. Quinn joined the conspiracy against Mr. Grant beginning in 2010; and
- h) Patrick J. Quinn, Governor of Illinois from 2009 until 2015 joined the conspiracy against Mr. Grant beginning in 2014.

See Field v. First Nat. Bank of Harrisburg, 619 N.E. 2d 1296 (Ill. App. Ct. 1993). See Feltmeier v. Feltmeier, 798 N.E. 2d 75 (Ill. 2003).

See Pinkerton v. United States, 328 U.S. 640 (1946).

SAVINGS STATUTE - 735 ILCS 5/13-217

- 4) Mr. Grant began his lawsuit in May of 2016 in the Illinois Central District. Mr. Grant's complaint is not time barred pursuant to 735 ILCS 5/13-217 ("Savings Statute").
 - a) Illinois Central District Judge Colin S. Bruce (16-cv-3132) dismissed Mr. Grant's complaint declaring Mr. Grant filed his lawsuit in the wrong court in 2016;
 - b) Illinois Central District Judge Colin S. Bruce declared in 16-cv-3245 the court lacked in personam jurisdiction;
 - c) The Illinois Court of Claims (18cc0946 and 18cc1057) dismissed Mr. Grant's complaints based on jurisdiction in 2018;
 - d) District of Nebraska Judge Richard G. Kopf (18-cv-246, 18-cv-247, and 19-cv-559) dismissed Mr. Grant's complaint for improper venue in 2020; and.
- ENTISIT & 2
- e) Southern District of Texas Judge David S. Morales (20-mc-871) dismissed Mr. Grant's complaint for lack of jurisdiction on December 11, 2020.
- 5) Mr. Grant began his lawsuit in May of 2016 in the Illinois Central District (16-cv-3132). Illinois Central District Judge Colin S. Bruce (16-cv-3132) claimed Mr. filed his case in the wrong court.

UNLAWFUL DETAINMENT STATUTE OF LIMITATIONS

6) Mr. Grant is within the statute of limitations pertaining to the claim of unlawful detainment. James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense lacked probable cause to detain Mr. Grant in Illinois. Mr. Grant is still being unlawfully detained in Illinois by Six Known Members of the U.S.

Department of Defense. The statute of limitations does not accrue until the unlawful detainment has ceased.

See Manuel v. Joliet, 580 U.S. (2017).

- 7) Mr. Grant's allegations are deemed admitted as true by the U.S. Department of Justice (DOJ) and State of Illinois' default history:
 - a) the DOJ and State of Illinois defaulted in 16-cv-3245 and 17-cv-3261 in the Illinois Central District (ILCD);
 - the DOJ defaulted and failed to appear in 19-cv-3001 in the Illinois Central District;
 - c) the State of Illinois defaulted and failed to appear in 18-L-202 in the Seventh Judicial Circuit of Illinois; and
 - d) default was entered against the State of Illinois in 20-cv-173 in the Eastern District of Virginia.

See Eckel v Bynum, 240 Ill. App. 3d. 867.

See Pitts ex rel. Pitts v. Seneca Sports, Inc., 321 F. Supp. 2d. 1353, 1357 (S.D. Ga. 2004).

See Nishimatsu Constr. Co. v. Houston Nat. Bank, 515 F. 2d. 1200, 1204 (5th Cir. 1975).

See Descent. Kolitsidas, 396 F. Supp. 2d. 1315, 1316 (M.D. Fla. 2005).

- 8) The State of Illinois consented to being made a defendant pursuant to: 745 ILCS 5/1 (State Lawsuit Immunity Act).
- 9) The State of Illinois consented to suit pursuant to: 5 ILCS 430/15-25 (State Officials and Employees Ethics Act - Whistleblower Protection Act - Remedies).
- 10) The State of Illinois waived sovereign immunity by consenting to 16-MR-643 being removed from the Seventh Judicial Circuit of Illinois to the Illinois Central District as 16-cv-3245 and 17-cv-3261.
- 11) Patrick J. Quinn, Governor of Illinois from 2009 until 2015; Ryan Croke, Illinois Governor Patrick J. Quinn's Deputy Chief of Staff and Chief of Staff from 2009 until 2015; and Illinois State Police Trooper Tyler Price are not shielded by sovereign immunity as they demonstrated wilful and wanton disregard for the law of Illinois, and

EVHIBIT # 2

deprived Mr. Grant of his rights as a citizen of the United States under the color and authority of state law.

See Johnson v. Lankford, 245 U.S. 541 (1918).

See Scheuer v. Rhodes, 416 U.S. 232 (1974).

- 12) Mr. Grant has a cause of action (Count I) against James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for conspiracy:
 - a) thirty (30) years of unlawful detainment and unlawful restraint;
 - b) assault and battery;
 - c) intimidation;
 - d) invasion of privacy;
 - e) unlawful arrest;
 - f) denial of Due Process;
 - g) denial of Equal Protection of The Law; and
 - h) retaliatory discharge.
- 13) Mr. Grant has a cause of action (Count II) against Patrick J. Quinn and Ryan Croke for conspiracy:
 - a) whistleblower retaliation (5 ILCS 430/15-10);
 - b) retaliatory discharge;
 - c) denial of Due Process; and
 - d) denial of Equal Protection under the Law
- 14) Mr. Grant has a cause of action (Count III) against Ryan Croke for invasion of privacy.
- 15) Mr. Grant has a cause of action (Count IV) against Tyler Price for conspiracy:
 - a) Assault and battery;
 - b) Unlawful restraint; and
 - c) denial of due process and equal protection of law.

BACKGROUND

- 16) James A. Baker III entered into a conspiracy with William Pelham Barr, and Six Known Members of the U.S. Department of Defense to unlawfully detain Mr. Grant in Illinois for nearly thirty (30) years under threat of military force beginning in 1992.
 - a) Due Process and Equal Protection Illinois Constitution Article I, Sect. II
 - b) Civil Conspiracy See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994);

- c) Unlawful restraint See Florida v. Bostick, 501 U.S. 429 (1991); and
- d) False imprisonment See Heck v. Humphrey, 512 U.S. 477, 484
- 17) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S.

 Department of Defense entered into a conspiracy with Illinois Governor James 'Jim'

 Edgar in 1992 to have the State of Illinois provide employment opportunities ("State jobs") and tuition waivers to individuals who reported the words and actions of Mr. Grant to Gregory K. Harris, and conspired against Mr. Grant at the direction of Gregory K. Harris.
 - Searches, Seizures, Privacy and Interceptions Illinois Constitution Article I, Section VI;
 - b) Civil Conspiracy See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994);
- 18) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S.
 Department of Defense trafficked Mr. Grant to Springfield, Illinois from the Pentagon in Virginia in 1992, and left Mr. Grant with Dr. Bill Grant and Armenta Johnson to be:
 - a) beaten;
 - b) endure psychological warfare; and
 - c) the U.S. Department of Defense's Witness to the 9/11 Terrorist Attacks
 See 740 ILCS 128/20 (Predator Protection Act).
 See Florida v. Bostick, 501 U.S. 429 (1991) (Unlawful restraint).
 See Heck v. Humphrey, 512 U.S. 477, 484 (False Imprisonment).

NEGLIGENT ENTRUSTMENT

19) William Pelham Barr, Attorney General of the United States under President George H.W. Bush negligently entrusted Gregory K. Harris with the power and authority of the Illinois Central District U.S. Attorney's Office and Illinois Central District Federal Bureau of Investigation to conspire against Mr. Grant.

See Norskog v. Pfiel, 197 Ill. 2d. 60 (2001).

RESPONDEAT SUPERIOR

- 20) William Pelham Barr as a member of the conspiracy with James A. Baker III and Six Known Members of the U.S. Department of Defense:
 - a) placed Gregory K. Harris on the payroll of the Illinois Central District U.S.
 Attorney's Office to illegally surveil and conspire against Mr. Grant;
 - b) William Pelham Barr directed the Illinois Central District U.S. Attorney's Office and Illinois Central District Federal Bureau of Investigation to cooperate with Gregory K. Harris' implementation of the conspiracy masterminded by James A. Baker III against Mr. Grant;
 - c) acquired the cooperation of Illinois Governor James 'Jim' Edgar to acquire the cooperation of officials and employees of the State of Illinois; and
 - d) acquired the cooperation of Illinois Governor James 'Jim' Edgar in providing Gregory K. Harris with jobs (State of Illinois employment opportunities) and tuition waivers to distribute to individuals who conspired against Mr. Grant at the direction of Gregory K. Harris. See Norskog v. Pfiel, 197 Ill. 2d. 60 (2001).
- 21) James A. Baker III, William Pelham Barr and Six Known Members of the U.S.
 Department of Defense are liable for the unlawful and conspiratorial actions of Gregory
 K. Harris against Mr. Grant under respondeat-superior (vicarious liability):
 - a) Gregory K. Harris as an agent of Six Known Members of the U.S. Department of Defense;
 - b) Gregory K. Harris took his directions ("orders") from Six Known Members of the U.S. Department of Defense;
 - c) Gregory K. Harris was on the payroll of the Illinois Central District U.S.
 Attorney's Office;
 - d) Gregory K. Harris was paid through the Illinois Central District U.S. Attorney's Office "regular" payroll;
 - e) Gregory K. Harris was provided office space in the Illinois Central District U.S. Attorney's Office by William Pelham Barr; and

- f) William Pelham Barr directed the Illinois Central District U.S. Attorney's Office and Illinois Central District Federal Bureau of Investigation to cooperate with Gregory K. Harris' unlawful endeavor;
- g) William Pelham Barr, James A. Baker III, and Six Known Members of the U.S. Department of Defense acquired to cooperation of Illinois Governor James 'Jim' Edgar;
- h) William Pelham Barr had the ability to terminate Gregory K. Harris' employment as Attorney General;
- Six Known Members of the U.S. Department of Defense have the ability to terminate Gregory K. Harris' employment through the Attorney General of the United States, and through the Illinois Central District U.S. Attorney.

See Merlo v. Public Service Co., 381 Ill. 300, 45 N.E. 2d 665 (1942)

See Gundich v. Emerson-Comstock Co., 21 Ill. 2d 117 (1960).

JOINT TORTFEASORS

- 22) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense are joint tort-feasors, and as joint tort-feasors are:
 - a) liable for the actions of Gregory K. Harris; and
 - b) liable for the actions of official and employees of the State of Illinois directed by Gregory K. Harris in furtherance of the conspiracy masterminded by James A.
 Baker III

See Woods v. Cole, 693 N.E. 2d 333 (Ill.1998).

AUTHORIZED ASSAULT

23) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense authorized the tortious actions of Gregory K. Harris against Mr. Grant.

See Collier v. Wagner Castings Co., 408 N.E. 2d 198 (Ill. 1980).

See Jablonski v. Multack, 380 N.E. 2d 924 (Ill. App. Ct. 1978).

See Heskett v. Fisher Laundry & Cleaners Co., 230 S.W. 2d 28 (Ark. 1950).

ASSAULT AND BATTERY

- 24) Mr. Grant has a cause of action against James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for civil battery. The elements of civil battery are:
 - a) the willful touching of another person;
 - b) intended to cause an unpermitted act; and
 - c) absence of victim's consent.

See Pechan v. Dynapro, Inc., 622 N.E. 2d 108 (Ill. App. Ct. 1993).

- 25) The Illinois Compiled Statutes defines battery as:
 - a) A person commits battery of he or she knowingly without legal justification by any means (1) causes bodily harm to an individual or (2) makes physical contact of an insulting or provoking nature with an individual.

See 720 ILCS 5/12-3. Battery

- 26) Mr. Grant has a cause of action against James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for assault. The elements of assault include:
 - a) intentional, unlawful offer of corporal injury by force, or force unlawfully directed;
 - b) to create a well-founded fear of imminent peril; and
 - c) the apparent present ability to effectuate the attempt if not prevented. See Parrish v. Donahue, 443 N.E. 2d 786 (Ill. App. Ct. 1982).
- 27) The Illinois Compiled Statutes defines assault as:
 - a) A person commits an assault when, without lawful authority, he or she knowingly engages in conduct which places another in reasonable apprehension of receiving a battery.

See 720 ILCS 5/12-1. Assault

28) Gregory K. Harris systematically directed private citizens to engage in assault and battery of Mr. Grant:

- a) Gregory K. Harris directed Mr. Grant's dentists to drill the enamel off Mr. Grant's teeth beginning in 1992;
- b) Gregory K. Harris directed Mr. Grant's optometrist to give Mr. Grant an incorrect prescription lens to diminish Mr. Grant's vision in 1995;
- c) Gregory K. Harris directed Mr. Grant's orthodontist to drill the enamel off Mr. Grant's teeth from 1998 to 2000;
- d) Gregory K. Harris directed Mr. Grant's chiropractor to break Mr. Grant's shoulder blade in 2012; and
- e) Illinois State Police Trooper Tyler Price extracted Mr. Grant's blood without a warrant, the needle penetrating Mr. Grant's body constitutes battery.

See Pechan v. Dynapro, Inc., 622 N.E. 2d 108 (Ill. App. Ct. 1993). See Missouri v. McNeely, 569 U.S. 141 (2013).

SEXUAL ASSAULT

- 29) Alan D. Brents and Larissa M. Young drugged and sexually assaulted Mr. Grant in 2003 at the direction of Gregory K. Harris.
- 30) Thomas W. Coats and Justin Cajindos drugged and sexually assaulted Mr. Grant in June of 2014 at the direction of Gregory K. Harris.

INTIMIDATION - 720 ILCS 5/12-6(a)(1)

- 31) Mr. Grant has a cause of action against James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for intimidation.
- 32) Mr. Grant was intimidated by the Six Members of the U.S. Department of Defense to stab Dr. Bill Grant in 2002 under threat if Mr. Grant did not comply, Six Known Members of the U.S. Department of Defense would send a Special Operations Soldier (Black OPs Soldier) to kill Dr. Bill. Grant.

See 720 ILCS 5/12-6(a)(1) - Intimidation

See Adock v Brakegate, Ltd., 645 N.E. 2d. 888 (1994) - Civil Conspiracy

33) Gregory K. Harris undermined Mr. Grant's legal defense in 2003 for domestic battery as a result of Mr. Grant stabbing Dr. Bill Grant by colluding with Mr. Grant's lawyers (Rudolph M. Braud and Michael J. Drake).

- See Due Process and Equal Protection Illinois Const. Article I, Sect. II See Adock v. Brakegate, Ltd., 645 N.E. 2d. 888 (1994) - Civil Conspiracy
- 34) Mr. Grant was intimidated to act as a homosexual for seven (7) years under threat of rape communicated by Gregory K. Harris and Six Known Members of the U.S. Department of Defense. Mr. Grant was intimidated (forced) to act as a homosexual from Decemer 9, 2008 until May of 2016.

See Due Process and Equal Protection Illinois Const. Article I, Sect. II See 720 ILCS 5/12-6(a)(1) - Intimidation

DRIVING UNDER THE INFLUENCE (DUI) CHARGES

35) In 2009, Gregory K. Harris, Six Known Members of the U.S. Department of Defense, Illinois State Police Trooper Tyler Price "set-up" Mr. Grant for a Driving Under the Influence (DUI) charge to "strip" Mr. Grant of driver's license with the consent of Illinois Governor Patrick J. Quinn, and Acting-Director of the Illinois State Police, Jonathon Monken.

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994). See Due Process and Equal Protection Illinois Const. Article I, Sect. II

- 36) In 2009, Illinois State Police Trooper Tyler Price "stopped" Mr. Grant for an alleged improper lane change:
 - a) Illinois State Police Trooper Tyler Price failed to mirandize Mr. Grant;
 - b) Illinois State Police Trooper Tyler Price failed to obtain a warrant to draw Mr.
 Grant's blood; and
 - c) Illinois State Police Trooper Tyler Price issued Mr. Grant multiple DUI tickets stemming from one 2009 traffic stop.

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994); See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI; See Due Process and Equal Protection - Illinois Const. Article I, Sect. II; and See Self-Incrimination and Double Jeopardy - Illinois Const. Article I, Sec. X.

37) The Sangamon County State's Attorney's Office filed multiple DUI cases against Mr. Grant stemming from one 2009 traffic stop at the direction of Gregory K. Harris.

- 38) Gregory K. Harris undermined Mr. Grant's legal defense by colluding with Mr. Grant's lawyers (Patrick T. Timoney and Sharp & Harmon):
 - a) Illinois State Police Trooper Tyler Price failed to mirandize Mr. Grant;
 - b) Illinois State Police Trooper Tyler Price failed to obtain a warrant to draw Mr. Grant's blood;
 - c) Illinois State Police Trooper Tyler Price issued Mr. Grant multiple DUI tickets stemming from one 2009 traffic stop; and
 - d) The Sangamon County State's Attorney's Office filed multiple DUI cases against Mr. Grant stemming from one 2009 traffic stop.

See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI; See Due Process and Equal Protection - Illinois Const. Article I, Sect. II; and See Self-Incrimination and Double Jeopardy - Illinois Const. Article I, Sec. X.

- 39) Patrick T. Timoney and Sharp & Harmon refused/failed to file a Motion to Dismiss Mr. Grant's DUI charges for a lack of evidence at the direction of Gregory K. Harris. See Due Process and Equal Protection Illinois Const. Article I, Sect. II. See Civil Conspiracy See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994);
- 40) Mr. Grant has a cause of action against Illinois State Police Trooper Tyler Price for assault and battery for drawing Mr. Grant's blood without a warrant.
 See Due Process and Equal Protection Illinois Const. Article I, Sect. II.
 See Searches, Seizures, Privacy and Interceptions Illinois Const. Article I, Sect. VI;
 See 720 ILCS 5/12-1. Assault.
 See 720 ILCS 5/12-3. Battery.
 See Missouri v. McNeely, 569 U.S. 141 (2013).
- 41) Mr. Grant was sober during his 2009 traffic stop with Illinois State Police Trooper Tyler Price.
- 42) Illinois State Police Trooper Tyler Price issued Mr. Grant the following traffic tickets from one 2009 traffic stop, and the Sangamon County State's Attorney's Office opened the following cases against Mr. Grant based on one 2009 traffic stop.

Case No.	Judge	Ticket Number	File Date	Offense	Case Type	Status	Statute
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10-DT-000030	Madonia	6248585	12/29/09	DUI/BAC 0.08	DUI	Disp.	None
10-DT-001754	Otwell	6247601	11/30/09	DUI	DUI	Disp.	625 ILCS 5/11-501(a)(2)
09-TR-047110	N/A	6247603	11/30/09	Improper Turn at Intersection	DUI	Disp.	625 ILCS 5/11-801
09-TR-047111	N/A	6247602	11/30/09	Improper Traffic Lane Usage	DUI	Open	625 ILCS 5/11-709(a)
09-TR-047112	N/A	6247605	11/30/09	Registration Light	DUI	Open	625 ILCS 5/12-201(c)
09-TR-047113	N/A	6247604	11/30/09	Headlight Violation	DUI	Open	625 ILCS 5/12-211(a)

ILLINOIS DEPARTMENT OF PUBLIC HEALTH INTERNSHIP

43) In 2009, Mr. Grant accepted an internship with the Illinois Department of Health (IDPH), during Mr. Grant's tenure at the IDPH, Mr. Grant's supervisors (Veronica Holloway and Doris Turner) habitually reported the words and actions of Mr. Grant to Gregory K. Harris.

See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI. See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

OFFICE OF THE ILLINOIS GOVERNOR INTERNSHIP

EVHIBIT #3 44) In 2010, Mr. Grant accepted an internship with the Office of the Illinois Governor.

> 45) In 2010, Ryan Croke, Illinois Governor Patrick J. Quinn's Deputy Chief of Staff, entered into a conspiracy with Gregory K. Harris to report the words and actions of Mr. Grant to Gregory K. Harris.

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI;

46) At the direction of Gregory K. Harris, Ryan Croke recruited other officials and employees of the State of Illinois to report the words and actions of Mr. Grant to Ryan Croke and Gregory K. Harris.

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI.

OFFICE OF THE ILLINOIS LIEUTENANT GOVERNOR

EVHIGHT 47) In 2011, Mr. Grant accepted employment with the Office of the Illinois Lieutenant Governor as a Policy Analyst. Mr. Grant was hired by Deirdre 'D.K.' Hirner.

- 48) Deirdre 'D.K.' Hirner entered into a conspiracy in 1992 with Six Known Members of the U.S. Department of Defense to hire Mr. Grant in the future.
 See Civil Conspiracy See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).
 See Searches, Seizures, Privacy and Interceptions Illinois Const. Article I, Sect. VI.
- 49) In 2011, at the direction of Gregory K. Harris, D.K. Hirner slandered Mr. Grant throughout the Illinois Capitol Complex labeling and leading others to believe Mr. Grant was:
 - a) a drug addict;
 - b) a child molestor;
 - c) an alcoholic;
 - d) using illegal substances in the office; and
 - e) incompetent.

ILLINOIS DEPARTMENT OF TRANSPORTATION

- 50) In 2012, Mr. Grant accepted employment with the Illinois Department of Transportation (IDOT). Mr. Grant was hired by the IDOT as a Staff Assistant (Technical Manager II).
- 51) Ann L. Schneider, Secretary of the IDOT, entered into an agreement with Six Known Members of the U.S. Department of Defense in 1992 to hire Mr. Grant in the future. See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994). See Searches, Seizures, Privacy and Interceptions - Illinois Const. Article I, Sect. VI.
- 52) Mr. Grant's supervisors and co-workers at the IDOT entered into a conspiracy with Gregory K. Harris to report the words and actions of Mr. Grant to Gregory K. Harris, and to "set-up" Mr. Grant for termination.

See Civil Conspiracy - See Adcock v. Brakegate, Ltd., 645 N.E. 2d. 888 (1994).

See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

- 53) In 2012, Mr. Grant was intimidated to file a civil rights complaint, or be physically accosted in the IDOT Hanley facility in Springfield, Illinois, and be accused of initiating a physical altercation.
 - See 720 ILCS 5/12-6(a)(1) Intimidation.
- 54) Furthermore, prior to Mr. Grant filing a civil rights complaint with the IDOT, Mr. Grant was threatened by his supervisor, Donald Kepfere harith, that if he filed a civil rights complaint, Mr. Grant would be retaliated against in multiple capacities.

 See 720 ILCS 5/12-6(a)(1) Intimidation.

 See 5 ILCS 430/15-10 Whistleblower Protection.
- 55) Mr. Grant was retaliated against by officials and employees of the State of Illinois for filing an ethics complaint with the Office of the Executive Inspector General (OEIG), and a civil rights complaint with the Illinois Department of Transportation in 2012.
 See 5 ILCS 430/15-10 Whistleblower Protection.
 See Adcock v. Brakegate, Ltd., 645 N.E. 2d. 888 (1994).
- 56) Mr. Grant endured a hostile work environment, work products being sabotaged, a negative performance evaluation, slander, geographic relocation, being assigned job tasks below Mr. Grant's pay grade, multiple attempts to "set-up" Mr. Grant for drug possession, a rescinded promotion, and multiple attempts to "set-up" Mr. Grant for wrongful termination.

See Whistleblower Protection Act (5 ILCS 430/15-25).

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

OFFICE OF THE ILLINOIS

T GOVERNOR

ENHISTIA A &

57) In November of 2014, Mr. Grant was being laid-off by IDOT as part of a material reorganization. Mr. Grant accepted employment with the Office of the Illinois Governor.

58) Governor of Illinois in 2014, Patrick J. Quinn, consented to Ryan Croke, Patrick J. Quinn's Chief of Staff, not adding Mr. Grant to the Illinois Governor's Office payroll in

2014 as retaliation for Mr. Grant filing an ethics complaint and a civil rights complaint with the State of Illinois in 2012.

See Whistleblower Protection Act (5 ILCS 430/15-25).

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

59) Governor of Illinois in 2014, Patrick J. Quinn, consented to his Chief of Staff (Ryan

Croke) and campaign Manager (Cheryl Byers) directing officials and employees of the Illinois Department of Employment Security to wrongfully deny Mr. Grant Federal unemployment benefits as retaliation for Mr. Grant filing an ethics complaint and a civil rights complaint with the State of Illinois in 2012.

See Whistleblower Protection Act (5 ILCS 430/15-10).

See Civil Conspiracy - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

60) In 2015, Mr. Grant found himself BLACKLISTED by Patrick J. Quinn, Ryan Croke, Cheryl Byers, Gregory K. Harris, and Six Known Members of the U.S. Department of Defense.

THOMAS W. COATS AGENT OF RYAN CROKE AND GREGORY K. HARRIS

- 61) Thomas W. Coats entered into a conspiracy with Ryan Croke and Gregory K. Harris to report the words and actions of Mr. Grant to Gregory K. Harris and Ryan Croke beginning in 2010.
- 62) Thomas W. Coats slandered Mr. Grant to officials and employees of the State of Illinois claiming/leading others/implying to others Mr. Grant is:
 - a) a drug addict;
 - b) a child molestor;
 - an alcoholic;
 - d) using illegal substances in the office; and
 - e) incompetent.
- 63) Thomas W. Coats vandalized Mr. Grant's automobile in 2013 in Chicago, Illinois at the direction of Gregory K. Harris.

- 64) Thomas W. Coats attempted to "set-up" Mr. Grant for drug possession, theft, wrongful termination, and sexual assault.
 - See Whistleblower Protection Act (5 ILCS 430/15-10).
 - See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).
- 65) Thomas W. Coats and Justin Cajindos sexually assaulted Mr. Grant in June of 2014 at the direction of Gregory K. Harris.
- 66) Thomas W. Coats and Michael Ziri (employee of the State of Illinois) attempted to "set-up" Mr. Grant for sexual assault of an Federal Bureau of Investigation employlee near the conclusion of 2014.
- 67) Thomas W. Coats took his instructions ("orders") from Ryan Croke and Gregory K. Harris.

CONSPIRACY

- 68) Mr. Grant has a cause of actions against James A. Baker III, William Pelham Barr, Six Known Members of the U.S. Department of Defense, Gregory K. Harris, Patrick J. Quinn, Ryan Croke, Tyler Price, and Thomas W. Coats for conspiracy. The elements of conspiracy are:
 - a) a conspiracy;
 - b) a purpose to deprive any person or class of persons of equal protection of the laws, or of equal privileges and immunities under the law;
 - c) an act by one of the the conspirators in furtherance of the conspiracy, and
 - a personal injury, injury to property, or a deprivation of any right or privilege of a citizen of the United States.

See Adcock v. Brakegate, Ltd.,645 N.E. 2d. 888 (1994).

See Griffin v Breckenridge, 403 U.S. 88 102-103 (1971).

UNLAWFUL SEIZURE / UNLAWFUL DETAINMENT / UNLAWFUL IMPRISONMENT

69) Mr. Grant has a cause of action against the defendants, James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for unlawful seizure, unlawful detainment, and unlawful imprisonment:

- a) James A. Baker III, Frank Carlucci, and Caspar Weinberger unlawfully detained
 Mr. Grant at Air Force Systems Command for three weeks in July of 1990;
- b) James A. Baker III and Six Known Members of the U.S. Department of Defense detained Mr. Grant in the basement of the Pentagon in Virginia from 1990 until 1992;
- c) James A. Baker III, William Pelham Barr, Six Known Members of the U.S.
 Department of Defense detained Mr. Grant in Illinois from 1992 until the present under threat of military force;
- d) James A. Baker III, William Pelham Barr, Six Known Members of the U.S. Department of Defense, and Gregory K. Harris have detained Mr. Grant in Illinois for nearly thirty (30) years without legal authority
- e) The detention of Mr. Grant has been without Mr. Grant's consent. See Due Process and Equal Protection - Illinois Const. Article I, Sect. II. See Searches, Seizures, Privacy and Interceptions - Ill. Const. Article I, Sect. VI. See Brower v County of Inyo, 489 U.S. 593 (1989).

RETALIATORY DISCHARGE

- 70) Mr. Grant has a cause of action against defendants, Patrick J. Quinn, Ryan Croke, and the Office of the Illinois Governor for retaliatory discharge:
 - a) Patrick J. Quinn and Ryan Croke terminated (failure to add to payroll) Mr.
 Grant's employment with the State of Illinois as retaliation for Mr. Grant filing two complaints with the State of Illinois in 2012;
 - b) Patrick J. Quinn and Ryan Croke terminated (failed to add to payroll) Mr. Grant in 2014 in direct violation of the Illinois Whistleblower Protection Act (5 ILCS 430/15-25); and
 - c) the Illinois Whistleblower Protection Act is a clearly mandated public policy. See Fellhauer v. City of Geneva, 142 Ill. 2d. 495 (1991). See Kelsay v. Motorola, 74 Ill. 2d. (1978).

71) Patrick J. Quinn is liable (respondent-superior) for Ryan Croke's failure to add Mr. Grant to the payroll of the Illinois Governor's Office in 2014 as retaliation for Mr. Grant filing a civil rights complaint and an ethics complaint with the State of Illinois in 2012.

See Merlo v. Public Service Co., 381 Ill. 300, 45 N.E. 2d 665 (1942).

See Gundich v. Emerson-Comstock Co., 21 Ill. 2d 117 (1960).

See Woods v. Cole, 693 N.E. 333(Ill. 1998).

72) Patrick J. Quinn is liable for Ryan Croke and Cheryl Byers directing officials and employees of the Illinois Department of Employment Security to deny Mr. Grant Federal unemployment benefits as retaliation for Mr. Grant filing an ethics complaint and a civil rights complaint with the State of Illinois in 2012.

See Merlo v. Public Service Co., 381 Ill. 300, 45 N.E. 2d 665 (1942)

See Gundich v. Emerson-Comstock Co., 21 Ill. 2d 117 (1960).

See Woods v. Cole, 693 N.E. 333 (Ill. 1998).

- 73) The Six Known Members of the U.S. Department of Defense directed Illinois Department of Employment Security Administrative Law Judge John Schellenberg to deny Mr. Grant Federal unemployment benefits to cause:
 - a) Mr. Grant financial hardship;
 - b) To leave Mr. Grant without income as Mr. Grant searched for employment in 2015; and
 - c) Mr. Grant to enter Federal court without financial resources requiring:
 - Mr. Grant to file his lawsuit as a poor person seeking leave to proceed in forma pauperis; and
 - 2) Mr. Grant's lawsuit to receive additional scrutiny by a judge for screening of frivolity.

See Holiday Magic, Inc. v. Scott, 282 N.E. 2d 452 (IL App. Ct. 1972).

74) Mr. Grant has a cause of action against James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense for abuse of process. The Six Known Members of the U.S. Department of Defense have directed courts across the country to dismiss Mr. Grant's lawsuit.

See Holiday Magic, Inc. v. Scott, 282 N.E. 2d 452 (IL App. Ct. 1972). See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

- 75) The Six Known Members of the U.S. Department of Defense directed the Illinois Central District to dismiss Mr. Grant's lawsuit in 2016:
 - a) to force Mr. Grant to walk from Springfield, Illinois to Washington, D.C. in 2017;
 - b) the Six Known Members of the U.S. Department of Defense attempted to assassinate Mr. Grant in Maryland in 2017;
 - in an attempt to prevent the conspiracy against Mr. Grant from coming to light;
 and
 - d) to save the defendants from paying damages to Mr. Grant.
 See Holiday Magic, Inc. v. Scott, 282 N.E. 2d 452 (IL App. Ct. 1972).
 See Due Process and Equal Protection Illinois Const. Article I, Sect. II.
- 76) The Six Known Members of the U.S. Department of Defense directed Federal courts across the country to dismiss Mr. Grant's lawsuit to:
 - a) force Mr. Grant to refile his lawsuit in multiple Federal district courts;
 - b) force Mr. Grant to file suit in more than Forty (40) Federal courts;
 - c) shield the Six Known Members of the U.S. Department of Defense from being sued for libel given the contents of Mr. Grant's multiple lawsuits contain details of fraud and corruption within the Federal government, and court dockets are a matter of public record.

See Nieman v. Versuslaw, 512 F. App. 'x 635 (7th Cir. 2013).

See Holiday Magic, Inc. v. Scott, 282 N.E. 2d 452 (IL App. Ct. 1972).

See Due Process and Equal Protection - Illinois Const. Article I, Sect. II.

WHISTLEBLOWER PROTECTION ACT (5 ILCS 430/15-25)

- 77) Mr. Grant's claim pursuant to the Whistleblower Protection Act (5 ILCS 430/15-25):
 - a) The State of Illinois took retaliatory action against Mr. Grant in response to Mr.
 Grant filing an ethics complaint and a civil rights complaint with the State of
 Illinois in 2012;
 - b) The retaliatory actions of the State of Illinois continued with Patrick J. Quinn and Ryan Croke not adding Mr. Grant to the Illinois Governor's Office payroll in 2014;

- c) Ryan Croke and Cheryl Byers with the consent of Patrick J. Quinn directed officials and employees of the Illinois Department of Employment Security to deny Mr. Grant Federal unemployment benefits as retaliation for Mr. Grant filing two complaints with the State of Illinois in 2012;
- d) In 2015, Mr. Grant found himself BLACKLISTED by officials and employees of the State of Illinois at the direction of Cheryr Byers, Ryan Croke, Patrick J. Ouinn, Gregory K. Harris, and Six Known Members of the U.S. Department of Defense;
- e) Mr. Grant's Whistleblower Protection Act (5 ILCS 430/15-25) claim is not barred by the statute of limitations;
 - Mr. Grant's state law claims were removed to Federal court in 2016, and while a case is pending in Federal court, the statute of limitations is tolled; and
- g) Mr. Grant's lawsuit has been pending in Federal court for four (4) years. See Artis v District of Columbia, 135 A. 3d 334).
- 78) The City of Springfield (Illinois), Illinois Department of Transportation (IDOT), Office of the Illinois Governor, and State of Illinois have a history of engaging in conspiracies:
 - a) Whitlow v. Martin, 719 F. Supp. 2d 983 (C.D. 2010);
 - b) Tamayo v. Blagojevich, 526 F. 3d 1074, 1086 (7th Cir. 2008);
 - c) Renatta Frazier v. Harris (City of Springfield);
 - d) Tammy Duckworth, Illinois Department of Veterans Affairs
- 79) Six Known Members of the U.S. Department of Defense

Caspar Weinberger, Secretary of Defense

Frank Carlucci, Secretary of Defense

James N. Mattis, Secretary of Defense

JOSEPH F. Dunford, Chairman of the Joint Chiefs of Staff

John F. Kelly

Mark Esper, Secretary of Defense

WILLIAM HOWARD TAFT IV, DEPUTY SECRETARY OF DEFENSE

Michael J. Madigan Jesse White **Emil Jones** Barack H. Obama ILLINOIS STATE POLICE

- 81) Forty-one (41) Federal courts have not found Mr. Grant's allegations to be:
 28 USC 1915(e)(2)(B)(i) is frivolous or malicious;
 28 USC 1915(e)(2)(B)(ii) fails to state a claim on which relief may be granted; or
 28 USC 1915(e)(2)(B)(iii) seeks monetary relief against a defendant who is immune from such relief.
- 82) Mr. Grant seeks in damages.

109) DONALD HENRY RUMSFELD,

SECRETARY OF THE US. DEPARTMENT OF DEFENSE FROM 2001 UNTIL

William Lee Grant II 901 Wythe Road Springfield, Illinois 62702 (217)726-5269

3/15/202I

2006, CONSENTED TO THE ACTIONS OF SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE UNDER THE GUISE OF A DOMESTIC SURVEILLANCE PROGRAM

110) DONALD HENRY RUMSFELD CONSENTED TO NOT BEING FULLY INFORMED OF THE PARAMETERS OF THE DOMESTIC SURVEILLANCE TO MAINTAIN

PROMPTIONS OF SIX KNOWN MEMBERS OF THE FOR U.S. DEPARTMENT OF DEFENSE

SUPERIOR AND COMMAND RESPONSIBILITY.

SEE PAQUETE HABANA, 175 U.S. 677 (1900).

SEE IN RE YAMASHITA, 327 U.S. 1 (1946).

- 83) RES JUDICATA IS NOT APPLICABLE:
 - a) MR. GRANT'S LAWSULT HAS NOT BEEN
 DECIDED ON THE MERITS: CLERK OF COURT
 - THE ILLINOIS CENTRAL DISTRICT FAILED
 TO ENTER DEFAULT (FED. R. CIV. P. 55(a)

 IN 16-CV-3845, 17-CV-3861, AND 19-CVMEMBERS OF THE U.S. DEPARTMENT OF

 DEFENSE;
 - COLIN S. BRUCE (IG-CV-3245 AND IT-CV-326I) AND JOE BILLY MCDADE (19-CV-300I) DISMISSED MR. GRANT'S LAWSUIT AT THE DIRECTION OF SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE;
 - OF ILLINOIS JUDGE BRIANT, OTWELL (II-MR-754) DISMISSED MR. GRANTS LAWSVIT DIRECTION OF GREEN AMOUNT HARLES;
 - (LAUDE M. HILTON (19-CV-LARS) AND ROSSIE DISMISSED MR. GRANT'S LAWSUITS AT THE DIRECTION OF SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE
 - D) SECOND SULT INVOLVING PARTIES OR PRIVIES:
 - I) MR. GRANT BROUGHT SUIT AGRINST THE U.S.

 DEPARTMENT OF JUSTICE AND STATE OF ILLINOIS

 IN 16-CV-3045 AND 11-CV-3061;

- II) MR. GRANT BROUGHT SUIT AGAINST THE U.S. DEPARTMENT OF DEFENSE IN 19-CV-3001.
- (ENTRAL INTELLIGENCE AGENCY AND SPECTAL COLLECTION SERVICE IN 19-CV-IZZ'S AND
 - C) BASED ON THE SAME CAUSE OF ACTIONS

 1) MR. GRANT HAS NOT PREVIOUSLY BROUGHT A CLAIM
 UNDER 18 USC 1595 PEONAGE SLAVERY, AND
- HUMAN TRAFFICKING,
 LAN CLAIMS AGAINST INDIVIDUALS, EXCEPT
 - SEE HAZEL-ATLAS GLASS CO. V HARTFORD-EMPIRE
- 84) EASTERN DISTRICT OF VIRGINIA JUDGE ROSSIE D. ALSTON JR. (20-CV-173) DISMISSED MR. CALANT'S LAWSUIT IMPROPERLY INVOICING RES JUDICATA.
- 108) DONALD HENRY RUMSFELD, Well II 1/2021 SECRETARY OF THE U.S. DEPARTMENT OF DEFENSE FROM 2001 UNTIL 2006, CONSENTED TO THE ACTIONS OF SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE UNDER THE GUISE OF A DOMESTIC
- 109) OPERATIONS HOMETOWN GLORY IS A U.S. DEPARTMENT OF DEFENSE DOMESTIC BLACK SURVEILLANCE BANNER OF THE U.S. DEPART MENT OF JUSTICE.



William Howard Taft IV was the Deputy Secretary of the U.S. Department of Defense when James A. Baker III (President Ronald Reagan's White House Chief of Staff) and Caspar Weinberger began (circa 1985) siphoning funds from the Strategic Defense Initiative to genetically-engineer Mr. Grant.



Upon the resignation of Caspar Weinberger as Secretary of the U.S. Department of Defense,
Frank Carlucci became involved in James A. Baker III and Caspar Weinberger's endeavor to
siphon funds from the Strategic Defense Initiative. Upon the conclusion of the administration of
President Ronald Reagan, James A. Baker III, Casper Weinberger, and Frank Carlucci failed to
disclose to Secretary of Defense Dick Cheney that the previous administration had been engaged
in genetic engineering.



When Mr. Grant was born in July of 1990, James A. Baker III, Caspar Weinberger, and Frank Carlucci recruited William Howard Taft IV for assistance in further acquiring U.S. Department of Defense resources for their evil enterprise.



William Howard Taft IV facilitated the transfer of Mr. Grant from Air Force Systems Command in Maryland to the basement of the Pentagon in Virginia in 1990.



James A. Baker III, Caspar Weinberger, and Frank Carlucci acted through William Howard Taft IV; James A. Baker III was the Secretary of the U.S. Department of State; Caspar Weinberger and Frank Carlucci were both retired Secretaries of the U.S. Department of Defense; and James A. Baker III, Caspar Weinberger, and Frank Carlucci had no operational authority over the U.S. Department of Defense.



James N. Mattis, Joseph F. Dunford Jr. John F. Kelly, Mark T. Esper, Gregory K. Harris, and Joint Special Operations Command (JSOC) took their official orders from William Howard Taft IV, Deputy Secretary of the U.S. Department of Defense.



William Howard Taft IV petitioned President George H. W. Bush to be appointed the United States Permanent Representative to the North Atlantic Treaty Organization (NATO) in 1990, while still serving as Deputy Secretary of the U.S. Department of Defense until the conclusion of President George H. W. Bush's administration in 1993.



William Howard Taft IV was "offshored." William Howard Taft IV remained as Deputy Secretary of Defense, but was on the Federal payroll as the U.S. Permanent Representative to NATO. William Howard aTaft IV continued to work at the Pentagon in Alexandria, Virginia until the conclusion of President George H.W. Bush's administration.



William Howard Taft IV had the paperwork for his resignation backdated to make it appear William Howar Taft IV resigned from the U.S. Department of Defense prior to Mr. Grant being transferred from Air Force Systems Command in Maryland to the basement of the Pentagon in Virginia in 1990.



William Howard Taft IV was complicit in engineering Mr. Grant's life to give cause for Mr. Grant to appear in Federal court, and cooperated in obtaining the assistance of officials and employees in the state of Illinois to conspire against Mr. Grant beginning in 1992.



William Harm Taft IV assembled with James N. Mattis, Joseph F. Dunford Jr., and Mark T. Esper to assassinate Mr. Grant in Maryland in 2017 as Mr. Grant walked from Springfield, Illinois to Washington, D.C. as a condition set by the Six Known Members of the U.S. Department of Defense for Mr. Grant to continue his lawsuit.







The Six Known Members of the U.S. Department of Defense set the condition that Mr. Grant must walk from Springfield, Illinois to Washington, D.C. after his Federal lawsuit was dismissed in 2016 as a pretence to have Mr. Grant leave Springfield, Illinois, and appear isolated on the road to Washington, D.C.

The Six Known Members of the U.S. Department of Defense planned and attempted to assassinate Mr. Grant in 2017 to conceal their multi-decade unconstitutional and racially motivated conspiracy against Mr. Grant.

Well 3/25/2021

- Q8) DONALD JOHN TRUMP, PRESIDENT OF THE
 UNITED STATES FROM 2017 UNTIL 2021, CONSENTED
 TO SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT
 OF DEFENSE DIRECTING ILLINOIS CENTRAL
 AND JOE BILLY MCDADE (19-CV-301) AND EASTERN
 HILTON (19-CV-1228) AND ROSSIE D. ALSTON JR.
 (20-CV-173) TO DISMISS MR GRANT'S LAWSUIT. EMIBIT 39
 EVHIRIT 11.
- 99 DONALD JOHN TRUMP CONSENTED TO THE SIX KNOWN CONTINUED UNLAWFUL DETAINMENT OF DEFENSE'S AFTER 2017.
- DONALD JOHN TRUMP IS NOT SHIELDED BY ABSOLUTE IMMUNITY. THE PRESIDENT DOES NOT HAVE THE AUTHORITY TO UNLAWFULLY DETAIN A U.S. CITIZEN FOR YEARS, NOR SEE NIXON V

FITZGERALD, 457 U.S. 731 (1982).



Mr. Grant has a cause of action against James A. Baker III, William Pelham Barr, Six Known Members of the U.S. Department of Defense, and Gregory K. Harris for fraud.



The elements of fraud are:

- 1) A material misrepresentation of a fact:
 - a) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense informed Mr. Grant in the basement of the Pentagon in 1990 that if Mr. Grant survived the Evil Enterprise (OPERATION: HOMETOWN GLORY) engineered by the aforementioned men to give cause for Mr. Grant to appear in Federal court, the Six Known Members of the U.S. Department of Defense would allow Mr. Grant to go on with the remainder his life;

2) Knowledge of its falsity:

- a) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S.
 Department of Defense had no intention of allowing Mr. Grant to go on with the remainder of his life after filing suit in Federal court;
- b) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense engineered Mr. Grant's life hoping Mr. Grant would commit suicide prior to reaching Federal court in 2016;
- c) In 1990, James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense:
 - 1) planned to have Mr. Grant appear in Federal court as an indigent individual;
 - 2) planned to have Mr. Grant's lawsuit (16-cv-3245) dismissed;
 - 3) informed Mr. Grant the only way for his lawsuit to continue was for Mr. Grant to walk from Springfield, Illinois to Washington, D.C. in 2017;
 - 4) plotted to assassinate Mr. Grant in Maryland in 2017 while Mr. Grant was trekking to Washington, D.C.

3) An intent to induce reliance:

- a) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense required Mr. Grant to work with Joint Special Operations Command (JSOC) in the basement of the Pentagon from 1990 to 1992 to review the parameters of Mr. Grant's life:
 - 1) Mr. Grant was to be beaten;
 - 2) endure psychological warfare;



- stab Dr. Bill Grant to prevent the Six Known Members of the U.S. Department of Defense from killing Dr. Bill Grant;
- 4) act as a homosexual for seven (7) years;
- 5) graduate from high school;
- 6) graduate from college;
- 7) obtain employment with the State of Illinois;
- be retaliated against by officials and employees of the State of Illinois to give cause for the Attorney General of Illinois to appear in Federal court;
- 9) Mr. Grant was to walk from Springfield, Illinois to Washington, D.C. in 2017 as a condition of Mr. Grant's lawsuit coming to fruition after Mr. Grant's lawsuit was dismissed in 2016 by the Illinois Central District;
- b) Gregory K. Harris repeatedly told Mr. Grant from 1992 until 2015, that Mr. Grant would be allowed to live out the remainder of his life, after he had filed suit in 2016;
- c) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense gave Mr. Grant their word in the basement of the Pentagon from 1990 until 1992 that if Mr. Grant made it to Federal court, the Six Known Members of the U.S. Department of Defense would allow Mr. Grant to live out his life.
- 4) Justifiable Reliance by the Plaintiff:
 - a) Mr. Grant was four (4) years old when Mr. Grant was detained in the basement of the Pentagon for two and a half years;
 - b) Mr. Grant was "dropped-off (trafficked)" in Springfield, Illinois in 1992 to be:
 - 1) beaten;
 - 2) endure psychological warfare;
 - 3) the U.S. Department of Defense's witness to the 9/11 Terrorist Attacks;
 - c) James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense directed the following in 1992 to not aid Mr. Grant:
 - 1) Federal Bureau of Investigation Illinois Central District
 - 2) U.S. Attorney's Office Illinois Central District
 - 3) Springfield Police Department;
 - 4) Sangamon County Sheriff's Office;
 - 5) Sangamon County State's Attorney's Office;
 - Seventh Judicial Circuit Judges; and
 - Illinois Central District Judges;



d) Mr. Grant took James A. Baker III, William Pelham Barr, and Six Known Members of the U.S. Department of Defense at their word that Mr. Grant would be allowed to live his life his lawsuit was completed;

5) Damages:

- a) Mr. Grant has been unlawfully detained by Six Known Members of the U.S. Department of Defense for thirty (30) years;
- b) Mr. Grant has had his U.S. Constitutional rights violated for thirty (30) years;
- c) Mr. Grant has been assaulted;
- d) Mr. Grant was intimidated to act as a homosexual for seven (7) years;
- e) Mr. Grant has endured the most egregious retaliation campaign in response to filing an ethics complaint and a civil rights complaint with the State of Illinois in 2012;
- f) Mr. Grant has been left indigent by the actions of James A. Baker III, William Pelham Barr, Six Known Members of the U.S. Department of Defense, and Gregory K. Harris;
- g) The Six Known Members of the U.S. Department of Defense have blocked Mr. Grant's access to judicial remedy by direction Illinois Central District Judges Colin S. Bruce (16-cv-3245 and 17-cv-3261) and Joe Billy McDade (19-cv-3001) and Eastern District of Virginia Judges Claude M. Hilton (19-cv-1228) and Rossie D. Alston Jr. (20-cv-173) to dismiss Mr. Grant's lawsuit;
- h) Gregory K. Harris directed Seventh Judicial Circuit of Illinois Judge Brian T. Otwell (17-MR-754) to dismiss Mr. Grant's lawsuit;
- i) Mr. Grant's requested damages in the amount of \$99 Trillion in 19-cv-3001, 19-cv-1228, and 20-cv-173

See Eurycleia Partners, LP v. Seward & Kissel, LLp, 12 N.Y. 3d 553, 559 (2009).

See Menaco v. New York Univ. Med. Ctr., 213 A.D. 2d 167 (1st Dept. 1995).

See Gregor v. Rossi, 120 A.D. 3d 447 (1st Dept. 2014).

Donald J. Trump is liable for the actions of Six Known Members of the U.S. Department of Defense under respondeat superior and joint tortfeasor liability.

See Pinkerton v. United States, 328 U.S. 640 (1946).

See Norskog v. Pfiel, 197 Ill. 2d. 60 (2001).

See Woods v. Cole, 693 N.E. 2d 333 (Ill. 1998)

SEE SCHEUEL V BHODES, 416 U.S. 236(1974) SEE WOOD VSTRICKLAND, 420 U.S. 308

DONALD J. TRUMP AS PRESIDENT OF THE UNITED STATES FROM 2017 UNTIL 2021, ACTED OUTSIDE THE SCOPE OF HIS AUTHORITY (DUTIES) CONSENTING DEPARTMENT OF DEFENSE DIRECTING ("THREATENING") FEDERAL JUDGES TO DISMISS MR. GRANT'S LAWSUIT.

DONALD JOHN TRUMPS ACTIONS I WERE OUTSIDE
THE SCOPE OF HIS AUTHORITY (DUTIES) AS PRESIDENT
OF THE UNITED STATES, AND A DIRECT VIOLATION
OF THE U.S. CONSTITUTION. THUS, DONALD JOHN TRUMP
SHIELDED BY ABSOLUTE IMMUNITY.

SEE WOOD V STRICKLAND, 420 U.S. 208 (1975). SEE MARBURY V MADISON, 5U.S. 137 (1803).

SEE KENDALL V UNITED STATES ex rel. STOKES,

SEE HARLOW V FITZGERALD, 457 U.S. 800 (1982).

SEE BUTZ V ECONOMOU, 438 U.S. 478 (1978).

DONALD JOHN TRUMP, WILLIAM PELHAM BARR, JAMES A. BAKER TIL, AND SIX KNOWN MEMBERS OF THE U.S. DEPARTMENT OF DEFENSE DETAINED MR. GRANT WITHOUT LEGAL AUTHORITY.

Well ld 4/9/2021